

## **U.S. Department of Justice**

United States Attorney Eastern District of New York

BWB:NDB F. #2015R01848

271 Cadman Plaza East Brooklyn, New York 11201

February 17, 2016

## By ECF and FedEx

Mark A. Macron, Esq. 491 Bard Avenue 2nd Floor Staten Island, New York 10310 T. 718-889-3582

Re: United States v. Nadeem Mehmood Quraishi

Criminal Docket No. 15-598 (CBA)

Dear Mr. Macron:

Enclosed please find the government's second production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. The enclosed documents are redacted copies of the requested medical records relating to the victim's medical examination ("rape kit") on or about October 26, 2015, Bates-numbered VDM QURAISHI000031-QURAISHI000060. They are being produced pursuant to the agreed-upon protective order.

As the government has previously informed you, testing of the rape kit was negative as to the presence of the defendant's DNA.

Before trial, the government will furnish materials discoverable pursuant to Title 18, United States Code, Section 3500, as well as impeachment materials. <u>See Giglio v. United States</u>, 405 U.S. 150 (1972).

Very truly yours,

ROBERT L. CAPERS United States Attorney

By: /s/ Nomi D. Berenson

Nomi D. Berenson Assistant U.S. Attorney (718) 254-6308

## **Enclosures**

cc: Clerk of the Court (CBA) (by ECF) (without enclosures)